

### **REMARKS**

At first, Applicant appreciates that the Examiner conducted a personal interview with the representative of the Applicant on February 8, 2005. During the interview, the proposed amendment substantially same as the currently submitted Claims 1 – 16 and the reference Li et al. (US 2002/0111819 A1) were discussed. Applicant's representative pointed out the differences between the present invention and the cited Li reference. The Examiner agreed to reconsider his position after Applicant files the amendment as proposed.

In this Amendment, Applicant has cancelled Claims 2 – 4 and 6 without prejudice or disclaimer and amended Claims 1, 5, and 7 – 14. Claims 1, 5, 7 – 9, 11 and 13 have been amended to specify the embodiments of the present invention and overcome the rejections. Claims 5 and 14 has been amended to depend on Claim 1. In addition, Claims 5 and 7 – 14 have been amended to proper dependent form. It is respectfully submitted that no new matter has been introduced by the amended claims. All claims are now present for examination and favorable reconsideration is respectfully requested in view of the preceding amendments and the following comments.

### **REJECTIONS UNDER 35 U.S.C. § 102:**

Claims 1 – 16 have been rejected under 35 U.S.C. § 102 (b) as allegedly being anticipated by Li et al. (US 2002/0111819 A1), hereinafter Li.

Applicant traverses the rejection and respectfully submits that the presently claimed invention is not anticipated by the cited reference. At first, Claims 2 – 4 and 6 have been cancelled. The rejection to these claims is moot. In addition, it is respectfully submitted that Claim 1 has been amended to specify that the steps of the supply chain management method of the present invention. The support for the amendment can be found in the throughout the specification, for example, the cancelled Claims 2 – 4, 6 and the description in description on page 6, lines 6 to 18 of the specification. In addition, the

physical thing being tracked in the supply chain is referred to as an “item” in the amended claims, and the basis for this is to be found on page 6, lines 20 to 23 of the specification. Claims 5 and 7 – 16 also include these features due to their dependency on Claim 1.

The embodiment of the present invention as amended provides a very simple mechanism for consistent tracking of inventory in a supply chain. According to the method for generation of a unique reference defined in Claim 1, the references are all unique and there is no possibility of confusion. For example, the geographical indicator being a component and successive components being unique in the context of the preceding component ensure the uniqueness and universality of use of the supply chain management method. Because the modification of an item spawns one or more fresh unique references for the child items and the child items are linked back to the parent items, there is excellent traceability throughout the full supply chain.

A UR could be applied to any desired item, and the selection of unit may be made on traceability grounds. For example, it could apply to a pallet of cartons or a drum of chemicals. If every carton on a pallet has similar production criteria, then a UR may be applied to the full pallet. Alternatively, if there are different criteria for each carton, there may be a UR for each carton. The flexibility of application of URs, the termination of every UR as soon as its associated product’s supply chain life ends and the linking of children UR to parent URs all provide a comprehensive structure for supply chain management.

In addition, because of the successive components used (each being unique in the context of the preceding one) to generate the UR and linking of child and parent URs, the method may be easily performed in a universal manner across multiple producers or organisations generally.

Applicant respectively submits that there is no disclosure or suggestion of the features of Claim 1 in Li reference. At the end of paragraph [0202] on page 14 of Li, it is

stated that a disassociated tote may be associated with a new pallet. A tag already in the database can be associated with a new asset according to the description at the end of paragraph [0058] on page 4 of Li. To the contrary, Claim 1 of the present invention states that the unique reference is terminated when the associated item life ends. There is no further recording of transactions against the reference. In addition, Applicant would like to draw Examiner's attention that Li states in page 4 paragraphs [0039] and [0043] that "one asset can have multiple tags associated with it". This is completely different from the UR of the present invention as amended.

In addition, it is respectfully submitted that Li fails to suggest that a unique reference is generated for a modified product. Furthermore, there is no disclosure in Li to suggest linking a fresh UR with the UR for the product before modification. Also, there is nothing to suggest spawning of fresh URs. Furthermore, there is no description of how the tags of Li (or any possible equivalent to our UR) are generated. In the passages in paragraphs [0197 to 0205] describing a fresh goods supply chain, there are descriptions emphasizing physical handling and washing of totes. This is significantly from the steps indicated in the amended claims of the present invention. As explained during the interview, the system in Li will not be able to perform the steps in Fig. 2 of the present application.

In summary, Li does not disclose the unique reference, the step of spawning child item and linking of child item with parent item and terminating an item by preventing further transaction records as specified in the amended claims.

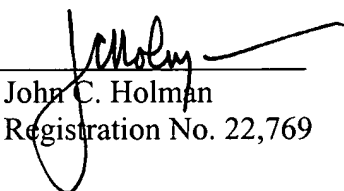
Therefore, the newly presented claims are not anticipated by Li and the rejection under 35 U.S.C. § 102 (b) has been overcome. Accordingly, withdrawal of the rejections under 35 U.S.C. § 102 (b) is respectfully requested.

Having overcome all outstanding grounds of rejection, the application is now in condition for allowance, and prompt action toward that end is respectfully solicited.

Respectfully submitted,

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